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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re:)	Case No. 11-35359-C-7
)	Chapter 7
ADAM REGAN JOSEPH JONES AND)	Docket Control # JDM-001
ALLANA ANN JONES,)	
)	Date: July 26, 2011
)	Time: 9:30 a.m.
Debtors.)	Place: Courtroom 35, Dept. C
)	501 I Street, 6th Floor
)	Sacramento, CA 95814
)	Judge: Christopher M. Klein

DEBTORS' MOTION FOR ORDER COMPELLING
TRUSTEE TO ABANDON DEBTOR'S BUSINESS
AS ASSET OF ESTATE [11 U.S.C. §§554(b), 721]

Debtors ADAM REGAN JOSEPH JONES AND ALLANA ANN JONES, by and through their attorney of record, Edward A. Smith of the law firm of Dudugjian & Maxey, will and hereby do bring a Motion to Compel Trustee to Abandon the Estate's Interest in Debtors' sole proprietorship business known as Peerless Home Services ("Business") pursuant to 11 U.S.C. §§554(b) and 721 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 6007(b).

1 By this motion Debtors request that the Court enter an order compelling the Chapter 7
2 Trustee to abandon the bankruptcy estate's interest in Debtors' Business on the following grounds:

- 3 1. Debtors' Business does not possess or own any non-exempt assets that might be
4 liquidated for value to benefit creditors and is therefore of inconsequential benefit
5 to the estate,
6
7 2. The primary asset of the business is the goodwill, i.e., skills, knowledge and training
8 of the debtor, Adam Jones, an asset which has no value to the bankruptcy estate, and;
9
10 3. The retention and operation of the business by the Trustee would be burdensome and
11 costly to the estate and the creditors thereof.

12 Said grounds will be supported by the pleadings and papers on file in this bankruptcy case,
13 memorandum of points and authorities herein, declaration in support of this motion and exhibits, if
14 any, filed herewith, and by such oral and documentary evidence as the Court may permit upon the
15 hearing of this motion.

16 Dated: June 22, 2011

DUDUGJIAN & MAXEY
A Law Corporation

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20 By: /s/ Edward A. Smith
EDWARD A. SMITH
21 Attorneys for Debtors
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